

**COSDEN OIL & CHEMICAL COMPANY**

P. O. BOX 1311  
BIG SPRING, TEXAS 79720

November 10, 1983

EPA Region 5 Records Ctr.



323221

Mr. Karl J. Klepitsch Jr., Chief  
Waste Management Branch  
RCRA Activities 5 HW-13  
Region V  
P.O. Box A 3587  
Chicago, Illinois 60690-3587

**RECEIVED**

NOV 10 1983

WASTE MANAGEMENT BRANCH  
EPA REGION V

Dear Mr. Klepitsch:

Reference: Cosden Oil & Chemical Company  
ILD 091 766 410 *PA, G, TSD*  
Permit Application Withdrawal Letter

This letter is in reply to your letter of November 7, 1983  
(copy enclosed).

Enclosed is the original of our letter dated September 27, 1983  
and signed by our Vice President, Mr. Jerry G. Jenkins. A  
copy of the revised Closure Plan is included with the letter.  
I believe this completes the information requested. I apologize  
for the delay in forwarding this information to your  
staff.

If you should have any questions, please contact me.

Sincerely yours,

Ted M. Nairn, Jr.  
Manager, Environmental Activities

TMN:VLD

Attachments

CC: Mr. Jerry Jenkins  
Mr. Bill Reynolds  
Mr. Bob Anderson

11/16/83

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E.P.A. - D.L.P.C.  
STATE OF ILLINOIS



WHOLLY OWNED SUBSIDIARY OF AMERICAN PETROFINA, INCORPORATED





UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION V  
230 SOUTH DEARBORN ST.  
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:  
5HW-13

7 NOV 1983

Ted M. Nairn, Jr., Manager-Environmental Activities  
Cosden Oil and Chemical Company  
P. O. Box 1311  
Big Spring, Texas 79720



RE: Permit Application Withdrawal Letter  
FACILITY NAME: Cosden Oil and Chemical Company  
U.S. EPA ID NO.: ILD 091 766 410

Dear Mr. Nairn:

This is to acknowledge receipt of your letter of November 30, 1982, requesting the withdrawal of your Part A Hazardous Waste Permit Application. Your request was not signed and certified by an authorized person, in accordance with 40 CFR Part 270.11 (enclosed). Please resubmit your request with the correct signature and certification, so that your withdrawal can be processed. Your request must contain a detailed explanation why the application should be withdrawn. Also, if at any time, since November 19, 1980, your operation included treatment, storage, or disposal of hazardous waste subject to 40 CFR Part 265, a closure plan must be filed with the withdrawal request. Requirements for closure are found in 40 CFR Part 265 Subpart G (enclosed).

If no response is received in this office within 30 days, we will assume your facility requires a permit. Accordingly we will continue to process your application.

Please feel free to contact the Technical, Permits, and Compliance Section at (312) 353-2197 for assistance, if you have any questions. Please refer to "Permit Application Withdrawal Letter," in all correspondence on this matter.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief  
Waste Management Branch

Enclosure

cc: Richard Grimes, Plant Manager  
Ronald D. Medley

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EPA - D.L.P.C.  
STATE OF ILLINOIS

# COSDEN OIL & CHEMICAL COMPANY

P. O. BOX 2159

214-750-2827

DALLAS, TEXAS 75221

September 27, 1983

Mr. Karl J. Klepitsch, Jr., Chief  
Waste Management Branch  
U. S. Environmental Protection Agency  
Region V  
111 West Jackson Boulevard  
Chicago, Illinois 60604

Dear Mr. Klepitsch:

Subject: Cosden Oil & Chemical Company, 142nd Street &  
Paxton Avenue, Calumet City, Illinois 60409  
ILD 091766410

The purpose of this letter is to comply with the verbal request of Mr. Hak Cho concerning withdrawal of the Part A Application for the subject facility.

On November 30, 1982, Mr. Ted Nairn submitted a letter to you amending the information contained in the Part A Application. Mr. Cho requested additional information as follows:

- 1) Has facility stored wastes more than 90 days?
- 2) Certification per 40 CFR 122.6.

A check of our records indicates that wastes may have been stored for periods longer than 90 days.

I certify under penalty of law that I have personally examined and am familiar with the information submitted in Mr. Nairn's letter of November 30, 1982 and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Also, we enclose a copy of our revised Closure Plan which we believe is self explanatory.

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E.P.A. - D.L.P.C.  
STATE OF ILL. / A



WHOLLY OWNED SUBSIDIARY OF AMERICAN PETROFINA, INCORPORATED

Mr. Karl J. Klepitsch. Jr., Chief  
Waste Management Branch  
U. S. Environmental Protection Agency  
September 27, 1983  
Page Two.

If your staff should have any questions, please contact Mr. Ted Nairn at (915) 263-7661.

Sincerely yours,



JERRY G. JENKINS  
Vice President

cc: Mr. Bill Reynolds - Plant Manager  
Mr. Ted Nairn, Jr. - Mgr. Environmental Activities

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EPA - D.L.P.C.  
STATE OF ILLINOIS

CLOSURE PLAN  
DRUM STORAGE SITE A

Cosden Oil & Chemical Company  
Calumet City Plant  
Calumet City, Illinois  
August, 1983

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STATE OF ILLINOIS

(Revised for Withdrawal of Part A  
Application)

CLOSURE PLAN

Table of Contents

- I. General Information
- II. Scope
- III. Introduction
- IV. Description of Storage Site
- V. Details of Closure Plan
- VI. Certification of Closure

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EPA - D.L.R.C.  
STATE OF ILLINOIS

Closure Plan

I. General Information

A) Name of Facility: Cosden Oil & Chemical Company  
Calumet City Plant

B) Location: 142nd Street and Paxton Avenue  
Calumet City, Illinois

County: Cook

C) Operator: Cosden Oil & Chemical Company  
P.O. Box 178, Calumet City, Illinois 60409

Phone: (312) 862-6140

D) Person in Charge of Facility: Bill Reynolds, Plant Manager

E) Owner: Cosden Oil & Chemical Company  
P.O. Box 410, Dallas, Texas 75221

100-1-100

NOV 28 1983

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STATE OF ILLINOIS

## Closure Plan

### III. Introduction

Cosden Oil & Chemical Company (Cosden) owns and operates a facility at Calumet City, Illinois for the production of various grades of polymer resins of the styrenic family. The facility consists of two general types of polymer processes:

- 1) Suspension Batch Polymerization Process Units for the production of polystyrene (PS), High Impact Polystyrene (HIPS), Styrene-Acrylonitrile Polymers (SAN) and Acrylonitrile-Butadiene-Styrene Polymers (ABS); and
- 2) Continuous Mass (or Bulk) Polymerization Process units for the production of HIPS.

At the present time, all polystyrene production is limited to the Mass Units.

Cosden submitted the RCRA Interim Status Part A Application as a hazardous waste storage facility. The application included a list of all wastes which might be generated during the production of any of the styrenic resins produced at the facility. Based on changes to and interpretations of the regulations and test data obtained on wastes generated, it has determined that this facility can operate as a generator and does not need a storage facility permit.

Solid wastes and sludges are generated or accumulated at various points within the facility. Laboratory test results on representative samples of these wastes indicate that all the sludges and many of the solid wastes are non-hazardous. The wastes which have been determined to be hazardous are normally collected in drum quantities.

The Drum Storage Site is used to collect and store full drums of wastes. Normally these drums are accumulated until a full truck load is available for shipment to an approved disposal facility.

This Closure Plan has been amended in order to effect withdrawal of the Part A Application and/or effect termination of interim storage status.

The facility intends to operate as a hazardous waste generator. The Drum Storage Site will continue to be used as a collection area for drums of hazardous waste for periods up to 90 days. It may become necessary to make partial truck load shipments to comply with the maximum 90 day storage period.

NOV 28 1983  
EPA - D.L.P.C.  
OFFICE OF HAZARDOUS WASTE



## Closure Plan

### II. Scope

This Closure Plan is prepared in compliance with the applicable Code of Federal Regulations (CFR), Title 40, Part 265 - Interim Status Standards for Owners and Operators of Hazardous Waste Treatment, Storage and Disposal Facilities (40 CFR 265.110 through 265.115.)

The regulations require that the owner or operator must have a written closure plan which must identify the steps necessary to completely or partially close the facility at any point during its intended operating life and to completely close the facility at the end of its intended operating life.

This closure plan is prepared for the plant hazardous waste drum storage site.

The regulations do not require post-closure care for a storage facility.

NOV 29 1983

E.P.A. - D.L.B.C.  
STATE OF ILLINOIS

## Closure Plan

### V. Details of Closure Plan

The Drum Storage Site A will be closed to storage of hazardous waste for extended periods of time. (The site will continue to be used as a collection point for wastes up to the maximum of 90 days allowed under generator status.)

All drums of waste will be properly labeled and shipped to an approved off-site disposal facility.

The concrete slab will be thoroughly cleaned and any contaminants are placed in DOT approved drums for shipment to an approved off-site disposal facility. (There are normally no wastes on the slab.)

The possibility of any groundwater contamination adjacent to the storage area is very remote as the slab is surrounded by a six inch concrete curb with controlled drainage to a sump contained within the storage area.

All water and contaminants will be processed through the facility wastewater treatment unit.

NOV 29 1983

(Revised August 1982) 5-100-  
6-100-100

## Closure Plan

### IV. Description of Storage Site

The Drum Storage Site consists of a concrete slab approximately 30 feet by 90 feet surrounded by a concrete curb and includes a concrete sump within one corner of the site.

The site is located immediately north of the continuous mass process units.

All hazardous wastes are placed in drums before transferring them to the Drum Storage Site. The drums of waste are placed on wooden pallets for ease of handling and inspection. The use of pallets also reduces the potential for corrosion of the bottom of the drums.

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STATE OF ALABAMA

Closure Plan

VI. Certification of Closure

Drum Storage Site A  
Cosden Oil & Chemical Company  
Calumet City Plant  
Calumet City, Illinois

I hereby certify that I am familiar with the attached Closure Plan and that to the best of my knowledge the site has been closed in accordance with the specifications of the approved Closure Plan.

1) Operator of Site:

Signature: \_\_\_\_\_

Name: \_\_\_\_\_

Title: Plant Manager

2) Independent Registered Professional Engineer:

Signature: \_\_\_\_\_

Name: \_\_\_\_\_

Registration No. \_\_\_\_\_

State: \_\_\_\_\_

NOV 28 1993  
E.P.A. - D-1120  
STATE OF ILLINOIS

*Lead-Nature*

*bcc - Kris Jerry  
Jiffy, Markie  
Ken Lombay*

# COSDEN OIL & CHEMICAL COMPANY

P. O. BOX 1311  
BIG SPRING, TEXAS 79720  
TELEPHONE (713) 243-7461

November 30, 1982

Mr. Karl J. Klepitsch, Jr., Chief  
Waste Management Branch  
U.S. Environmental Protection Agency  
Region V  
111 West Jackson Blvd.  
Chicago, Illinois 60604

NOV 28 1983

EP-11 - 0120  
CHIEF OF DIVISION

Dear Mr. Klepitsch:

Subject: Cosden Oil & Chemical Company, 142nd Street & Paxton Ave.  
Calumet City, Illinois 60409 ILD091766410

The purpose of this letter is to amend the information submitted in Cosden Oil & Chemical Company's, Part A Application (Forms 3510-1 and 3510-3) to effect withdrawal of that application in lieu of submitting the Part B Application. This letter will also confirm my conversation with Mr. Hak Cho of your staff on October 7, 1982 concerning this subject.

On November 18, 1980, Cosden Oil & Chemical Company filed a Part A Application based on our interpretation of the interim status requirements of the May 19, 1980 regulations. Subsequent changes to, and interpretations of, these regulations by EPA indicates that Cosden's Part A Application is somewhat over-protective. In addition, due to the lack of representative test data, the application included all facilities within the Calumet City Plant where hazardous wastes or sludges might be accumulated or stored for more than 90 days. Since the time of that application, test data have been obtained on all wastes generated in the Plant. It has been determined that all the wastes which accumulate in the wastewater unit are non-hazardous.

Based on our interpretation of the regulations, as amended, we believe it is appropriate to request withdrawal of the Part A Application. Enclosed are Attachments I and II with information which amends, or explains, the information submitted in the Part A Application. I hope that this is sufficient information for your agency to make a favorable determination in this matter.

Additionally, we understand, that if withdrawal of the Part A Application is approved, that any facilities which have been used to store hazardous wastes (i.e., the Drum Storage Area) will be required to comply with closure procedures even though the same facility will continue to be used by the plant as a hazardous waste generator. We respectfully request that your agency consider a waiver of these closure procedures since the closure plan for



Mr. Klepitsch  
Page 2  
November 30, 1982

the Drum Storage Area (Appendix C enclosed) consists of shipping all drummed wastes out for proper disposal and clean-up of the concrete slab. These procedures are routinely followed each 90 days or more frequently as necessary at the present time.

If you have any questions or require additional explanation, please contact me at the above address or telephone (915)263-7661.

Sincerely yours,

*T. M. Nairn, Jr.*

Ted M. Nairn, Jr.  
Manager, Environmental Activities

TMN:VLD

Enc.

CC: Mr. Ron Medley, Vice President, Chemical Operations  
Mr. Richard Grimes, Plant

PS Form 3811, Aug. 1978

1. SENDER: Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.

2. The following service is requested (check one):  
☐ Show to whom and date delivered.  
☐ Show to whom, date, and address of delivery.  
☒ RESTRICTED DELIVERY.  
Show to whom and date delivered.  
☐ RESTRICTED DELIVERY.  
Show to whom, date, and address of delivery.

(CONSULT POSTMASTER FOR FEES)

3. ARTICLE DESCRIPTION: Waste Management, U.S. Envir. Protection Agency, 164 W. Jackson Blvd., Chicago, IL 60604

4. REGISTERED NO. 207683274 CERTIFIED NO. INSURED NO.

(Always obtain signature of addressee or agent)

I have received the article described above.  
SIGNATURE ☐ Addressee ☐ Authorized agent

5. DATE OF DELIVERY DEC 9 - 1982

6. ADDRESS (Complete only if requested)

7. UNABLE TO DELIVER BECAUSE:

POSTMARK: CHGO, IL 60604 DEC 2 1982

USPS INITIALS

P 207 683 274  
RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—  
NOT FOR INTERNATIONAL MAIL  
(See Reverse)

1. SENT TO: Waste Management, U.S. Envir. Protection Agency, 164 W. Jackson Blvd., Chicago, IL 60604

2. STREET AND NO.

3. P.O., STATE AND ZIP CODE

4. POSTAGE \$ 37

5. CERTIFIED FEE \$ 75

6. SPECIAL DELIVERY \$

7. RESTRICTED DELIVERY \$

8. SHOW TO WHOM AND DATE DELIVERED \$

9. SHOW TO WHOM, DATE, AND ADDRESS OF DELIVERY \$

10. SHOW TO WHOM AND DATE DELIVERED WITH RESTRICTED DELIVERY \$

11. SHOW TO WHOM, DATE AND ADDRESS OF DELIVERY WITH RESTRICTED DELIVERY \$

12. TOTAL POSTAGE AND FEES \$ 112

13. POSTMARK OR DATE

PS Form 3800, Apr. 1976

NOV 23 1983

E.C.A. - D.L.P.C.  
STATE OF ILLINOIS

ATTACHMENT I

The following information will amend the information submitted on page 1 of Form 3510-3.

- Line 1; S01, 55 gallon: This represents Hazardous Wastes accumulated and stored in 55 gallon drums. These wastes may be shipped within each 90 day period.
- Line 2; S02; 110,000 gallons: This represents the concrete reactor dump pit which is used only for emergencies. Section 265.198 (a)(3) would have been applicable for ignitable wastes. Test data was not available at the time of the application due to the infrequent use of this facility. Test data on these wastes have demonstrated that the wastes are non-hazardous. Therefore this facility should have been excluded from the Part A Application.
- Line 3; S02, 80,000 gallons: This represents one of the concrete wastewater unit settling basins. Test data was not available at the time of the application. Test data on this waste has demonstrated that the sludge is non-hazardous. Therefore, this facility should have been excluded from the Part A Application. The proposed regulations (45 FR 76074), if finalized in their present form, would further exempt the wastewater unit if the sludge were hazardous.
- Line 4; S02, 90,000 gallons: This represents another concrete wastewater unit settling basin operated in parallel with the one described in Line 3 above. The same comments apply.
- Line 5; S02, 55,000 gallons: This represents the concrete equalization basin in the wastewater unit. This basin is downstream of those described in Line 3 and 4 above. The same comments apply as outlined for Line 3 above.
- Line 6; S02, 43,000 gallons: This represents the concrete wastewater unit clarifier which is downstream of the equalization basin. The same comments apply as outlined for Line 3 above.
- Line 7; S02, 16,000 gallons: This represents a steel storage tank designed to receive wastes from a spill of acrylonitrile in the plant. All acrylonitrile wastes have been placed directly in drums for disposal in the past. Acrylonitrile is not used in the plant at the present time. The May 19, 1980 regulations required that a tank which could not be completely emptied within each 90 days would require a storage permit. However, the interpretation issued by EPA on January 11, 1982 (47 FR 1250) states that "A tank will be considered empty when its' contents have been drained to the fullest extent possible." Therefore, this tank can be "emptied" within each 90 day period if it is used.

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TMN-11/30/82

NOV 28 1983

EPA - D. C.

ATTACHMENT II

This information will amend the information submitted on page 3 of Form 3510-3.

- Line 1; U009, 60,000 pounds, S01: This represents an estimated amount of drummed wastes which might contain some amount of acrylonitrile. This material would be shipped within each 90 day period.
- Lines 2 through 7: This represent potential laboratory waste solvents. These will be shipped within each 90 day period.
- Lines 8 through 13: These represent contaminants which were suspected to be present in the wastewater unit sludges. Subsequent testing of the sludges has provided data to determine that the sludges are not hazardous. Please refer to the comments for Line 3 of Attachment I.
- Line 14; U009, 35,000 pounds, S02: This represents an estimated volume of acrylonitrile spills and washdown water to clean up the spills. Please refer to the comments for Line 7 of Attachment I.

NOV 28 1983

SEALED  
STATE OF ILL.

TMN/11-30-82



Appendix C

CALUMET CITY CLOSURE PLAN

DRUM STORAGE SITE A:

In the event of plant closure, this area will be void of any hazardous waste.

All drums will be properly labeled and shipped for disposal to a permitted off-site facility.

The concrete slab will be thoroughly cleaned with contaminants placed in DOT approved drums for shipment to an approved off-site facility.

The possibility of any ground water contamination adjacent to this area is remote as the slab is secured by a six inch concrete dyke with proper drainage to a sump contained within the storage area.

All water and contaminants would be processed through our waste treatment area.

NOV 28 1983

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